IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§ §	Chapter 11
	§	1
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
	§	(Jointly Administered)
Debtors. ¹	§	
	§	Re: Docket No. 917
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NOTICE OF FILING OF THE DEBTORS' PROPOSED ORDER GRANTING LIMITED RELIEF FROM THE AUTOMATIC STAY ON AUBREY WILD PERSONAL INJURY LITIGATION

- 1. On February 26, 2021, movant Aubrey Wild ("Movant") filed his *Motion* of Aubrey Wild for Partial Relief from the Automatic Stay (ECF No. 917) (the "Motion"). The Motion is currently set for hearing on April 16, 2021 at 9:00 a.m. prevailing Central time (the "Hearing").
- 2. In the days and weeks leading up to the Hearing, counsel for Fieldwood Energy LLC ("FWE") and its affiliated debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors") has been in frequent contact with Movant's counsel in an effort to resolve the Motion.
- 3. The Debtors communicated to Movant's counsel that the Debtors would agree to have the automatic stay lifted with the same terms approved by the Court in a number of other stay relief orders entered in these cases, as set forth in Attachment 1 hereto (the "**Debtors**'

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Proposed Order"). Movant has communicated to the Debtors' counsel that the Debtors' Proposed Order is not acceptable to Movant.

4. Accordingly, the Debtors hereby submit the Debtors' Proposed Order for reference at the Hearing.

Dated: April 15, 2021 Houston, Texas

/s/ Alfredo R. Pérez

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Attorneys for Debtors and Debtors in Possession

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Certificate of Service

I hereby certify that, on April 15, 2021, a true and correct copy of the foregoing document

was served as provided by the Electronic Case Filing System for the United States Bankruptcy

Court for the Southern District of Texas.

/s/ Alfredo R. Pérez Alfredo R. Pérez

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